

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

**VOLKSWAGEN GROUP OF
AMERICA, INC.**, a New Jersey
corporation,

Plaintiff,

v.

VDUBS ONLY, INC., a Texas
corporation, and **PEYMAN ZAMANI**,
an individual and principal of VDubs
Only, Inc.,

Defendants.

Civ. No. 24-11117-MAG

Honorable: Mark A. Goldsmith

Gregory D. Phillips (P80801)
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Attorneys for Plaintiff

**DECLARATION OF GREGORY D. PHILLIPS IN SUPPORT OF
MOTION FOR ENTRY OF DEFAULT CERTIFICATE
BY THE COURT CLERK**

I, Gregory D. Phillips, under criminal penalty under the laws of the State of Michigan and the United States, do declare and swear as follows:

1. I am competent to testify herein and make this statement based on my

personal knowledge.

2. I am counsel of record for plaintiff Volkswagen Group of America, Inc. (“VW”) in this matter and a partner at PCFB Law.

3. I caused the Summons and Complaint to be served on defendants VDubs Only, Inc. (“VDubs Only”) and Peyman Zamani (“Zamani”) (collectively “Defendants”) on May 8, 2024. *See* ECF 6 and 7.

4. Accordingly on May 9, 2024, I filed Proofs of Service. ECF 6 and 7.

5. Thereafter, Defendants did not file an Answer or any responsive pleading, and the time to do so has passed.

6. Defendants have not asked for, and VW has not granted, any agreement or stipulation for an extension of time to file an Answer or responsive pleading to the *Complaint*.

I declare under penalty of perjury of the laws of that State of Michigan and the United States of America that the foregoing is true and correct to the best of my knowledge.

EXECUTED this 31st day of May 2024 in Salt Lake City, Utah.

/s/ Gregory D. Phillips
Gregory D. Phillips
Attorneys for Plaintiff